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REMARKS

35 U.S.C. §102 Rejection, Cotten

The Examiner has rejected claims 1-21 under 35 U.S.C. §102(e) as being anticipated by Cotten (U.S. Patent No. 6,330,590). To support an anticipation rejection, each and every limitation of the claimed invention must be either taught or suggested in a single reference. Applicants do not believe Cotten teaches or suggests limitations of the claims. More specifically, all claims require at least two portions to be selected from the e-mail message for generation of at least two codes.

Cotten only generates a single code from each Spam message. Multiple Spam messages will generate multiple codes, but no Spam message generates more than one code. See Cotten Fig. 4, ref. 58; abstract, line 6; and col. 2, lines 28-30. Further, the whole message after stripping is used to generate the code, not a "portion" as is required by the claims. The type of Spam detection in Cotten is even more flawed than the similar one described in the background section of the present application on page 1, lines 24-28. A single textual change in the message body will result in a different signature being generated by Cotten. Spam generators have long known to put a rotating or random string in each message that changes such that messages have different signatures.

In contrast, the claimed invention selects at least two subsets of the message to generate separate codes upon. A rotating or random string outside the at least two subsets would not avoid detection of the message as SPAM. Cotten would be fooled into thinking two Spam messages were not the same by a single character change. For at least this reason, reconsideration of the rejection is respectfully requested.

CONCLUSION

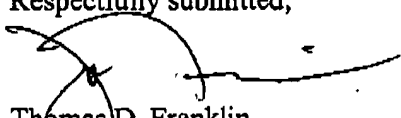
In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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